

Exhibit

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20 *Attorneys for Plaintiff*

21 **UNITED STATES DISTRICT COURT**
22 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

23 Thomas Few,

24 Plaintiff.

25 v.

26 United Teachers of Los Angeles, et. al,

27 Defendants.
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Case No. 2:18-cv-9531

**DECLARATION OF PLAINTIFF
THOMAS FEW**

1 Thomas Few, the undersigned Declarant and Plaintiff in the above captioned action,
2 declares under penalty of perjury:

3 1. I have been a special education teacher in the Los Angeles Unified School
4 District (LAUSD) since August 2016.

5 2. Since September 2016, I have taught at Francisco Sepulveda Middle School.

6 3. In August 2016, when I began my employment with LAUSD, I joined the
7 United Teachers of Los Angeles (UTLA). When I joined UTLA, neither UTLA nor LAUSD
8 informed me that I had the right not to join the union.

9 4. On February 13, 2018, UTLA offered me a union membership card that I
10 signed. Once again, I was not informed by UTLA or LAUSD of my right not to join the
11 union.

12 5. Later in 2018, I learned that I had a legal right not to be a union member but
13 to pay agency fees instead of full union dues. On or about June 2, 2018, I sent a letter to
14 UTLA asking to resign my membership and to become an agency fee payer.

15 6. On July 13, 2018, UTLA responded to my resignation letter by rejecting it.
16 UTLA stated that I could not resign from the union until my resignation window, which
17 was "not less than thirty (30) days and not more than sixty (60) days before" the anniversary
18 of my union membership on February 13.

19 7. After the Supreme Court issued its decision in *Janus v AFSCME*, I learned that
20 I had the right both not to be a member of the union and not to pay any money to the union.
21 I submitted a second resignation letter to UTLA on August 3, 2018. I received no response
22 from UTLA to my second resignation letter.

23 8. I also sent a copy of my August 3, 2018 UTLA resignation letter to LAUSD. I
24 did not receive a response from LAUSD.

25 9. On or about October 10, 2018, I submitted a third letter to UTLA, explaining
26 that the union agreement I had signed in February 2018 was invalid after the Supreme
27 Court's decision in *Janus*. I requested, once again, to resign from the union and stop having
28

1 its dues deducted from my paycheck. UTLA responded to my third letter by denying it
2 because it was not received within the resignation window.

3 10. LAUSD has deducted union dues of approximately eighty-six dollars (\$86) per
4 month from my paycheck since I began employment in August 2016. LAUSD continues to
5 deduct these dues, despite my repeated requests that it be stopped.

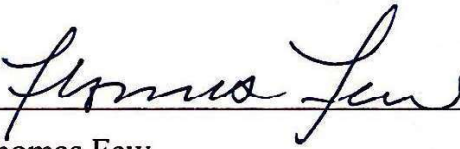
6 11. I do not wish to be a member of UTLA or to have union dues deducted from
7 my paycheck.

8 12. I do not wish UTLA to be my representative in bargaining negotiations with
9 LAUSD.

10 13. I do not approve of the political advocacy in which UTLA engages.

11 14. I do not agree with UTLA's threatened strike against LAUSD.

12 I, Thomas Few, declare under penalty of perjury that the foregoing is true and correct.

13
14 
15 Thomas Few

Executed on November 12, 2018.